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LTR-NRC-17-44
May 23, 2017

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Subject: Transmittal of Comments on DG-1285 [Docket ID NRC-2012-0110]

Westinghouse Electric Company LLC ("Westinghouse") appreciates the opportunity to provide comments to the NRC on Draft Regulatory Guide DG-1285, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis." Westinghouse appreciates the NRC staff's consideration of the following two comments:

1. Change of "Technical Adequacy" to "PRA Acceptability"

DG-1285 replaces the term PRA "technical adequacy" with "PRA acceptability." This change may result in confusion. On DG-1285, page 36, it notes that limited-scope applications may place a reduced burden on the PRA stating that: "A limited-scope application would lead the staff to conduct a more limited review of the risk results, therefore placing less emphasis on PRA acceptability than would be the case for a broad-scope application." That is appropriate and places the burden of acceptability of the PRA for the application with the regulator. However, DG-1285, page 42 notes that: "An independent peer review (as described in RG 1.200) is important in ensuring PRA acceptability." Thus, the industry peer review team determines the acceptability of the various high level and supporting requirements based on compliance to RG 1.200 (and the ASME Standard) regardless of the application. However, while the peer review can determine the adherence of the PRA to the various supporting requirements for the PRA in general, some applications will require greater detail in the modeling of specific systems, while other applications will require far less to support a specific application. The peer review at that level was intended to establish the technical adequacy of the supporting requirements, and as such, the term was chosen to focus on the PRA general capability. However, the term "PRA acceptability" now being used in DG-1285 implies: (1) the PRA is acceptable for an application, and (2) the PRA is acceptable based on compliance to RG 1.200. While these decisions will frequently be the same, it will not always be so and could result in confusion. Based on this reason, it is recommended that the term "technical adequacy" be retained when referring to the peer review process.

2. Once RG 1.174, Revision 3 is approved, NUREG-1855 should be revised to reference the appropriate revision number.

SUNSI Review Complete
Template = ADM - 013
E-RIDS = ADM-03

Add = A. Fairberston (Anders Fairberston)

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Page 2 of 2
LTR-NRC-17-44

If you need additional information, please contact Amanda Maguire at 860-731-6734 or maguiraj@westinghouse.com.

A handwritten signature in black ink, appearing to read "J. Gresham", with a long horizontal flourish extending to the right.

James A. Gresham, Manager
Regulatory Compliance